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August 24, 2023

File No. 47900.06

VIA ECF

The Honorable Lewis J. Liman
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street, Room 701
New York, NY 10007

REQUEST GRANTED.

The Jury Trial previously set for November 6, 2023
is rescheduled to December 4, 2023 at 9:00AM in
Courtroom 15C at the 500 Pearl Street Courthouse.

8/25/2023 SO ORDERED.

A handwritten signature of Lewis J. Liman in black ink. Below the signature is a horizontal line, and underneath that line, the text 'LEWIS J. LIMAN' and 'United States District Judge' are printed in a small, sans-serif font.

LEWIS J. LIMAN
United States District Judge

Re: *Hoxhaj, et al. v. Michael Cetta, Inc., et al.*
Docket No. 21-cv-06486 (LJL)

Dear Judge Liman:

We represent the defendants in the above referenced matter. We write today to respectfully request a brief adjournment of the trial date in this matter, currently scheduled to begin on November 6, 2023, due to a pre-existing, paid family travel commitment by defense counsel.¹

The undersigned has served as lead counsel for defendants since the outset of this litigation, has taken and defended all depositions, authored the dispositive motion briefing filed before the court, and will first chair the upcoming trial of the remaining claims. Trial is scheduled to begin on November 6; however, the undersigned has a travel commitment that was booked on October 13, 2022, approximately seven months prior to the scheduling of this trial.² That commitment will take defense counsel out of the office and out of state between November 9 through November 18, 2023.

¹ To the extent required, defense counsel is willing to provide supporting documentation for the Court's *in camera* review.

² Counsel apologizes for the delayed nature of this application, as he did not have the planned travel on his calendar and, upon realizing the potential interference with the trial schedule, immediately contacted plaintiffs' counsel on August 7, 2023 in an attempt to obtain mutually available alternative dates. Plaintiff's counsel advised today, August 24, 2023, that his clients would not consent to a lengthy adjournment, but that they might be able to agree to an extension in late-November or early-December.

The Honorable Lewis J. Liman
October 19, 2022
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With jury selection scheduled to begin on November 6, and at least five witnesses expected to be called for examination, it appears unlikely that trial will be complete in three days. Accordingly, Defendants respectfully request that trial be adjourned to a date in late-November or early-December.

We thank the Court for its consideration of this request and for any courtesy it is willing to provide.

Respectfully,

/s/ Adam E. Collyer

Adam E. Collyer of
LEWIS BRISBOIS BISGAARD &
SMITH LLP

cc: *All Counsel of Record*